



FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.

ORIGINAL

★ NOV 05 2019 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

J & J Sports Productions, Inc.,

Plaintiff,

BROOKLYN OFFICE

18 cv 05088 (DLI) (SMG)

v.

Magaly Belliard *et ano.*

Defendants.

ANSWER BY PRO SE DEFENDANT MAGALY BELLIARD

Pro se defendant Magaly Belliard hereby answers the allegations in the above-captioned Complaint as follows:

1. Legal conclusion to which no response is required.
2. Legal conclusion to which no response is required.
3. Legal conclusion to which no response is required; otherwise, denied.
4. Legal conclusion to which no response is required.
5. Legal conclusion to which no response is required; otherwise, denied.
6. Without knowledge and therefore denied.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admit as to Belliard's position at New Santiago Restaurant Corp.; deny that the corporation had any involvement in reception of programming or that any

unlawful activity occurred. The program referenced in the Complaint was viewed by a private individual.

12. Legal conclusion to which no response is required; otherwise, denied.

13. Denied. The program referenced in the Complaint was purchased through Verizon, paid for, and was viewed solely by a private individual.

14. Denied.

15. Denied.

16. Denied.

17. Defendant incorporates the responses above.

18. Without knowledge and therefore denied.

19. Without knowledge and therefore denied.

20. Without knowledge and therefore denied.

21. Without knowledge and therefore denied.

22. Without knowledge and therefore denied.

23. Without knowledge and therefore denied.

24. Denied.

25. Admitted.

26. Without knowledge and therefore denied; the corporation and Belliard had no involvement in the broadcast; a private individual paid \$79.99 to Verizon to watch the program referenced in the Complaint and viewed such program alone, in his individual capacity.

27. Defendant incorporates the responses above.

28. Legal conclusion to which no response is required.

29. Legal conclusion to which no response is required; otherwise denied.

30. Denied. There was no commercial involvement.

31. Legal conclusion to which no response is required; otherwise, denied.

32. Legal conclusion to which no response is required; otherwise, denied.

33. Legal conclusion to which no response is required; otherwise, denied.

34. Legal conclusion to which no response is required; otherwise, denied.

a. Legal conclusion to which no response is required; otherwise, denied.

b. Legal conclusion to which no response is required; otherwise, denied.

Defendant specifically denies that any alleged violation was willful and demands strict proof thereof.

c. Legal conclusion to which no response is required; otherwise, denied.

Defendant specifically denies that Plaintiff is entitled to any costs except those explicitly provided for by statute.

d. Legal conclusion to which no response is required; otherwise, denied.

35. Defendant specifically denies that Plaintiff is entitled to investigative costs.

Dated: 11-5, 2019.

Magaly Belliard

Magaly Belliard

Defendant, pro se

[address]: 3412 Fulton ST
Bklyn NY 11208
[phone number]: 347-784-7217
917-827-5858